

**DRAFT - Communications and Community Involvement Strategy for Libby Asbestos Site****Why Do We Need This Strategy?**

It isn't possible to get all Libby residents and stakeholders to agree with us on our actions. Debating with residents and stakeholders to convince them we are right often makes us appear petty and defensive. Arguing a point can lead to emotional interactions that leave residents feeling like EPA is incapable, stubborn, uncaring, dishonest, arrogant, self serving - just plain wrong. If people don't trust the messenger, they will never accept your message.

We believe we have an important job to do, a good team and a well-thought out cleanup plan. In short, we are responsible, responsive and effective. We need people to see that before we propose a final cleanup plan. The first step is to change the negative perceptions and emotions that cloud people's perspectives. Our goal for the next year, in all aspects of our job, is to diligently and systematically earn the public's confidence and trust through our performance. We will have to meet the basic needs of the community, consistently and firmly correct misperceptions and do a better job communicating the positive things about our team and the cleanup. This will enable people to evaluate the cleanup and the upcoming Record of Decision as objectively as possible.

This plan identifies groups of people we need to reach, their key interests, and messages that reinforce how we are addressing what's important to them. It also includes the specific actions we will take to convey and support those messages.

The basic messages we want to convey are:

- We are fair
- We can be trusted
- We care about people's health.
- Our cleanup is very protective
- We are using state-of-the-art science on this cleanup
- We are working hard to get a very complex cleanup done quickly
- We support economic development
- We are doing our best to balance complicated issues and sometimes competing objectives

Basic behavioral expectations for how we do this are:

- Be professional in all aspects of work
- Refrain from negative comments about team members, workers, contractors, bosses, the project
- Be patient with people and listen carefully, trying not to be defensive
- Show interest, ask questions, be empathetic, be aware of body language yours and theirs
- Earn public's trust and confidence through fair and consistent treatment
- Follow up with people in a timely manner and do what you promise
- Admit errors if you make them

Who do we want to reach ? What are their needs and how are we meeting them ?

Libby Residents

Libby residents have been dealing with the asbestos disaster since November 1999. Many people have been dealing with it for much longer than that, but EPA's investigation and cleanup and the media attention that came along with it have brought the events and circumstances to people's attention in a different light. There are varying points of view about the problems, the processes and the solutions. As in many small towns, some residents have long standing feuds with certain individuals or groups. Many divisions within the community existed long before EPA came to town. As much as possible EPA will avoid getting caught up in the community divisions and try, whenever possible to build bridges by looking for and emphasizing shared values, common interests and solutions that benefit the community as a whole.

Messages

- EPA will do everything it can to maximize the beneficial impacts and minimize harmful impacts of the cleanup on individuals and the community.
- Each home or business EPA cleans up is different and the procedures and cost will differ slightly, but the goal and the result should be the same - a protective cleanup.
- EPA spends \$20M per year (approx. 10% of national SF cleanup budget) to mitigate the remaining risk in Libby as quickly and thoroughly as we can.
- 79 % of Libby residents say that their opinion of EPA's work is satisfactory or very good.(based on a recent survey)

Troy Residents

The description of Libby residents and messages also apply to Troy residents. To date, however, Troy residents have been much less involved than Libby residents. They are now, through DEQs outreach efforts, beginning to attend more meetings and ask more questions. A few are surprised to find out that Troy is even part of the Superfund site. Now that DEQ has begun talking with people about sampling and cleanup, and there has been public discussion about removal of vermiculite from the high school attic, expectations will rise for the work to get done quickly. Since the budget for the Troy operable unit work is uncertain these expectations will have to be managed. In general the idea is that the work in Troy will proceed much like the work in Libby except on a smaller scale.

Messages

- DEQ has set the cleanup boundaries for Troy. These could change in special circumstances.
- This year DEQ will be talking with residents, and doing outreach and communication in preparation for future sampling and cleanup.
- EPA will be requesting money for sampling in Troy for 2006.

Local Residents who:

Need cleanup are concerned with the process, the risk, and the affect on their homes. Their perceptions about these things can be influenced by rumors they hear around town. They are inconvenienced by the relocation and may be confused about all the relocation details. They may

be worried about stress on family members or pets and the intrusion into their personal lives, even theft of their property. With regard to the cleanup itself, some may be afraid and want it to be very thorough and protective and angry when they find out we're leaving it in their walls. Others may wonder whether all the inconvenience is worth the benefit and be irritated that their tax dollars are being spent like this. They grant access anyway, however, because they know it will reflect on the worth of one of their greatest assets - their home. Most everyone will want all they can get in both cleanup and restoration.

Messages

- 91% of the people who completed our survey (96) after cleanup said the relocation details were explained clearly, they were reimbursed easily and the amount they received was adequate.
- 92% of the people who completed the survey said they were treated with courtesy and respect, well-informed about the work through staff and handouts, impressed with the health and safety precautions and glad they had the work done.
- EPA welcomes public input, questions, and wants to hear concerns. We take every suggestion for improvement seriously.

Had a cleanup done may be happy with it or they maybe upset or angry for a variety of reasons. If they are unhappy, they may be scared of residual risk if they believe that EPA didn't do a good job with the cleanup i.e., they can still see vermiculite in the yard, they now they have it in their walls etc. They may feel unfairly treated because something was done for someone else that wasn't done for them. They may feel angry because their home or yard was not restored properly and the government should do more to reimburse them for their loss. Sometimes they may just be greedy and want to get something from the government that they wouldn't have gotten before.

Messages

- Vermiculite \neq Asbestos. Visible vermiculite in soil is a good indicator that asbestos may be present, but does not guarantee that it's there. (Just as absence of vermiculite does not equate to absence of asbestos.)
- Soil samples are analyzed by our most sensitive testing methods - some of them developed just for Libby. We can detect very low levels of asbestos.
- EPA can't do anything it wants. There are many things we'd like to do for people that we are not authorized by law to do.
- Post cleanup sampling shows that the cleanup has been effective.

Need an urgent cleanup because they had a tree fall through the roof or septic tank failure, or a house fire that has exposed vermiculite may be scared of what they can already see or what they might dig up. They should be reassured that we will do all we can as quickly as we can for them. They may be impatient, eager to get the cleanup done so they can be protected, to back to business, rebuild, etc. They are already upset because of the tree, tank or fire; they want someone to help. They may need to talk with someone who can put them at ease.

Messages

- EPA is concerned about this. This is one of those unexpected situations that EPA must respond to quickly even with our tight schedule.
- EPA will work quickly to inspect the situation and/or collect samples to determine the level of asbestos present. We will quickly determine whether the situation needs guidance, special measures or a quick cleanup by EPA.
- In unexpected urgent cases, EPA may only be able to cleanup a portion of the property - the part presenting an unavoidable exposure pathway. Tight scheduling may prevent cleanup of the whole property at that time.

Asbestos victims and their families and friends

Victims of asbestos related disease are often emotional. Attention to their concerns and empathy are important. They know what it's like to suffer asbestos-related disease and worry about future generations suffering the same fate so the protectiveness of the cleanup is important to them. Many feel they have been wronged in the past by EPA and do blame the government for their medical problems. They may be angry that there is not more government assistance for medical care since their needs are often prohibitively expensive. Many are distrustful of W.R. Grace and EPA working with Grace (export plant, flyway, O&M) may seem like "conspiracy."

Messages

- Things were very different 30-40 years ago. Standards have changed, EPA has matured, the science of asbestos has advanced.
- EPA has an important job to do, a knowledgeable and experienced team and a well-thought out cleanup plan.
- EPA encourages anyone to bring health and safety issues to our attention and we move immediately to identify, correct and prevent that problem in the future.
- We must work with Grace to ensure that we can get the cleanup done as quickly as possible and with the maximum financial contribution by Grace.
- Any work done by W.R. Grace is done with EPA oversight and must be done to the same standards.

Teachers, parents, seniors

Protecting children from risk and knowing that future generations are being protected is important to this group. Safe schools will be high on their list of interests. Teachers may want to use their expertise and access to provide helpful information about the cleanup or preventing asbestos exposure to the children and their parents. Seniors with asbestos-related disease may be particularly concerned about medical care. Conversely, seniors who are not suffering from ARD may not be that concerned with the cleanup of their own homes - may perceive it as more trouble than it's worth.

Messages

- Children's health is one of EPA's top priorities.

- Libby schools have been sampled, cleaned where necessary and janitorial HEPA Vacs provided to each. Troy schools are in the process of being sampled. The High School will be cleaned up in summer 2005.
- EPA is coordinating with schools on outreach and education regarding the cleanup.
- EPA conducted a 2nd hand smoke campaign, with emphasis on the synergy between tobacco smoke and asbestos exposure. We support Libby Community Interagencies, the Tobacco Prevention Group in Libby.

Health care providers (CARD, SJLH, CHC, Libby Care Center, ARDNet, Ministers)

These groups' primary focus is medical and psychological and spiritual care for victims of ARD. They provide essential resources. They provide many types of care and counseling and may need general information from EPA and ATSDR. They want information on and assistance with victims' benefits when possible. For example they applied for an environmental justice grant from EPA to help provide psychological support for several Libby facilities. They didn't get it. They are interested in research on asbestos related illnesses and many are in support of a state-of-the-art research facility being located in Libby. Ministers are a trusted source of encouragement and inspiration for many people.

Messages

- EPA has and will continue to support health care organizations as much as we can (remember, health care is not our strong suit). We have provided money for screening and equipment.
- We will coordinate with other federal and state health agencies to work toward goals intended to increase health benefits to Libby residents.
- We will do our best to help health care organizations get grants that EPA may have to offer such as the EJ grant.

Real estate agents and related businesses (developers, appraisers, inspectors, landlords)

Real estate value or loss of revenue are important issues to this group. Liability issues may be a concern when selling or renting contaminated properties to others. Disclosure requirements for "vermiculite" are confusing and it seems no one is certain what exactly they HAVE to do, or SHOULD do, or what the consequences are. They would probably prefer all vermiculite was removed from the property and so, wouldn't have to worry about it in the future. Multiple property owners may be concerned about dealing with EPA on an ongoing basis until all their properties get cleaned up.

Messages

- Cleanup is the primary responsibility, but EPA supports economic development as much as possible. (Dream It Do It Workshop, Stimson, Realtors Meetings)
- While vacancy and revenue loss are not criteria for immediate cleanup, EPA spends \$20M per year (approx. 10% of national SF cleanup budget to mitigate the remaining risk in Libby as quickly and thoroughly as we can.
- Almost half of that amount goes directly into Libby in the form of salaries, benefits, housing, purchases, contracts and rentals.

- EPA is proceeding rapidly relative to other cleanups to complete a comprehensive cleanup and delete Libby from the Superfund list.
- 2004 was a very good real estate year in Libby.

Media

News reporters have been very involved in Libby in the past because of its "catastrophic" draw and because of the crusading opportunity it afforded reporters (Schneider and others). The diminishing coverage is partially due to the Libby disaster not being new anymore. Positive stories which may interest reporters in Libby are those that put things in context i.e., a story about the use of asbestos throughout history or heart-warming stories i.e., stories that document a positive change in Libby or for an individual because of EPA's work.

Messages

- EPA wants to be the FIRST and BEST source of information about the Libby cleanup.
- We appreciate getting interview topics ahead of the interview. To provide the most current and accurate information, we may need to confer with another team member.
- Remarks will be factual not speculative.
- We are accessible.
- We are honest.

Local elected officials

They want to be elected again to serve the people of Libby and Lincoln County so they are interested in being in the know about impacts on any constituency. They do not want to be caught unaware. They want it all: protective cleanup; local spending; getting off the Superfund list quickly so they can watch the stigma disappear into clean air; economic development; a trust fund to pay for cleanup of vermiculite left in place; oh, and credit for getting some of this done.

Messages

- Each home or business EPA cleans up is different and the procedures and cost will differ slightly, but the goal and the result are the same - a protective cleanup.
- Cleanup is primary responsibility, but economic development is important to EPA (Dream It Do It Workshop, Stimson, Economic Development write-up)
- asbestos, including Libby asbestos is a fact of life across the country and in Libby. Some exposures will not be stopped by EPA, and some burden may fall to the residents - how much is yet to be worked out.
- EPA is spending \$20M per year to mitigate risk in Libby. The program we have in place is designed to remove the most accessible materials and most significant exposures - as quickly and thoroughly as we can.
- the current cleanup approach is proceeding on the basis of the most valid information and protective assumptions.

Federal elected officials and the Governor

They want to be elected again to serve the people of Montana so they are interested in being in the know about impacts on any constituency. Because they aren't local, they aren't as worried about being caught unaware, but when they want something, they want it NOW. The pay off is

that sometimes they have access to money that could be put to good use in the community. In order to liberate that money, however, they want visibility and credit for getting it done. They are very sensitive in this regard. Political savvy is important. They have different strengths and interests to tap. They work for us and the people of Libby in a big way if we maintain good relationships.

Messages

- EPA will do everything it can to maximize the beneficial impacts and minimize harmful impacts of the cleanup on individuals and the community.
- The current cleanup approach is proceeding on the basis of the most valid information and protective assumptions.
- Cleanup is primary responsibility, but economic development is important to EPA.

Local Tradesmen (electricians, plumbers, carpenters)

Since EPA is leaving vermiculite in walls, these tradesmen know they have a high possibility of encountering it in the course of their work. They may often have to enter attics or cut into walls exposing them to asbestos. Because of this they may want EPA to do more in the way of cleanup. They may not take (or know) appropriate precautions. They may have concerns about the effect of leaving vermiculite in place on their businesses.

Local Contractors (road construction, excavators, laborers, linemen, surveyors)

These contractors will often encounter vermiculite in soil. Some may ignore it, some may stop work. They need guidance as to what may constitute a risk and what the appropriate precautions are. They also may not report vermiculite encounters if they feel that they have not handled it according to regulations. There may be some animosity about the competitive edge some contractors get by treating the material inconsistently i.e., not following regulations.

Messages

- Health and safety of workers and community is #1 concern.
- We know there are situations where you could be exposed and we want to provide guidance on precautions you can take.
- Visible vermiculite in soil is a good indicator that asbestos may be present, but does not guarantee that it's there.
- Please bring your concerns to our attention. Your issues are critical for EPA to address in the long-term.

Lincoln County and Local Technical Services (LCDEH, Building Dept., Sheriff, Fire)

This group is service oriented and practical. They manage the landfill, provide construction permits, fight fires, and provide protection for Libby residents. Being responsible for important community functions they may want to help generate, discuss ideas and research options. They may have a long term management, prevention or enforcement role to play in the cleanup. They aren't necessarily the leaders in Libby but they are probably well-respected and talk to many people. They may want to know what role if any, they have in the cleanup or may have in the future. They need to be consulted and kept abreast of aspects of the cleanup which affect them

such as development of a registry of which homes contain vermiculite in walls, transportation issues, safety precautions etc.

Messages

- EPA is interested in your ideas for long term management of vermiculite that is left in place or discovered after EPA leaves town.
- We want you to contact us with your present concerns about the cleanup. Is there information we can share with you in order to help you do your job better?

Cleanup workers

Workers doing cleanup are probably most driven by having a job and providing for their families. In order to do this they want to have a steady job, be well paid for the hazards of the job, and know that their supervisors are looking out for their health and safety. They may be on their guard for what looks like an employer trying to take advantage of them. They may be afraid to speak up for fear of losing their coveted jobs.

Messages

- EPA values the workers; they are critical team members.
- Workers have a big impact how the community perceives the cleanup.
- Health and safety of workers and community is #1 concern.
- We use protective safeguards in every part of the cleanup process from sampling and analysis, to cleanup to decontamination procedures.
- the current cleanup approach is proceeding on the basis of the most valid information available and protective assumptions.
- Please bring health and safety issues to our attention. We will move immediately to identify, correct and prevent the problem in the future.
- EPA doesn't control hiring.

Activists (including CAG, TAG, AARG)

Activists often see themselves as the people's guardians or watchdogs. They want to participate in the decision making (sometimes want to make the decisions!) and want to know that their input is being used. They can get entrenched in their positions and may need encouragement to communicate with different groups to appreciate that there are several legitimate points of view. They can be defensive because they fear the government may take advantage of the people if they don't keep us in check. Because of this, they sometimes go on the offensive, attacking us, sometimes publically, for any mistake or action that doesn't meet their expectations. Although they sometimes have limited technical knowledge, they want to show the people how much they know and that they are protecting them. In Libby, the activists (if they aren't anti-government types) want a very protective cleanup. They understand the concept of shoot for the moon and you may at least make it to the stratosphere.

Messages

- Libby is an EPA priority. Two EPA administrators, four Regional Administrators, three MT governors, the U.S. Congressional delegation have all come to Libby.

- On a project this big there are going to be mistakes. EPA's goal is to responsibly do the most protective cleanup with the resources available to us.
- EPA encourages anyone to bring issues to our attention and we'll move immediately to identify, correct and prevent the problem in the future.
- EPA can't do everything or anything it wants i.e., we can't try to get all the vermiculite out of Libby
- We are on the cutting edge in terms of research and response.
- The TAG has a special role in the community- to help people understand the technical issues - including those they learned about in Denver.

Civic Groups

There are many civic groups in Libby that are not solely focused on "asbestos cleanup." They meet for a variety of other reasons and have other goals. They often put together an agenda which includes guest speakers on a topic of interest to the community. Sometimes they may be scrambling to fill an agenda or a newsletter. EPA could attend one of their meetings and fill them in on the basics. Maybe they could also tell us what is top on their list of cleanup concerns. We may get invitations to some of these groups as a result of the survey sent out in March, 2005.

Messages

- EPA welcomes invitations from community groups to provide information and answer questions.

Economic Development and Business Interests

Groups interested in economic development are concerned with outsiders' view of Libby. They have been angry about negative news coverage about asbestos and Superfund (outside of EPA's control) and the stigma it creates. They are interested in promoting Libby as a beautiful and friendly small town with many recreation opportunities where you'd probably like to retire. They also want to recruit businesses which will provide much needed jobs. They are very interested in cleaning up and developing the old Stimson lumber mill. Individual business will naturally be concerned with the quality of the cleanup and restoration they get at their business. Also very important to them and to the several business groups in town are the impacts that doing the cleanup has on business. They may be dismayed about not being reimbursed for lost revenue. The money brought into Libby by the cleanup in the form of salaries, contracts, rentals, direct spending etc. is a positive for businesses.

Messages

- Cleanup is primary responsibility, but economic development is important to EPA.
- Dream It Do It Workshop provided a lot of ideas and stimulus to Libby businesses.
- EPA is spending \$20M per year to mitigate the remaining risk in Libby as quickly and thoroughly as we can.
- Almost half of that amount goes directly into Libby in the form of salaries, benefits, housing, purchases, contracts and rentals.
- EPA is proceeding rapidly relative to other cleanups to complete a comprehensive cleanup and delete Libby from the Superfund list.

Environmental groups

These protectors of and speakers on behalf of the land, water and air may be particularly interested in the affect of asbestos on forests, rivers and wildlife (logging, fishing and hunting). They are also interested in the environment for its own sake, but with asbestos we are largely focused on human health and are not yet building roads through wilderness areas. While low-key so far, they may show more interest as the mine cleanup/restoration starts. Also, with a Troy mine opening, environmental issues may be more prominent in the area. It may be a good idea to reach out and open the communication channels with these groups.

How do we get those messages across and who will do it? The whole team.

Operate in a Fish Bowl Assume the public is looking. Continue making time to talk with individuals; meeting with groups; sharing information; openly discussing issues - the good news and the bad, restating our messages; speaking in plain English; etc. In general, because of the scope and gravity of the problem; criminal charges; media scrutiny, national implications and politics we HAVE and will continue to operate in a fish bowl.

- Remind people of the positive effects of the cleanup
- Present EPA messages in a proactive and positive way

Overcome natural defensiveness which may prevent you from really hearing, understanding and using input that is potentially useful to the project. Be open to the possibility of the other person being right about what they are saying.

- Listen carefully; take notes if appropriate. Don't interrupt and argue.
- If you disagree, empathize first, then present an alternate point of view in a positive way.

Observe Take advantage of every opportunity to observe - and to listen to - each of the interest groups in Libby (not just the vocal or powerful ones) in an unstructured, non-threatening, informal setting. Think about productive ways to make use of what you hear at the breakfast counter or the bar. What are people asking at the Info Center? What's the gossip?

- Get into the field more. Be visible and get involved. Attend local meetings
- Get more involved in local volunteer/community service organizations

Maintain a Listening Log on Info Center Wall by the copier and at CDM. Write down new things you hear - good and bad- and pass them on to Karen and Linda at the end of the week.

- Bring people's input and ideas back to the team and to Karen and Linda, in particular.

News Media EPA team members prefer to talk with the media when we are available. We do not insist, however, that all media inquiries about Libby go through one person or even through EPA. The whole team must meet media needs for speed and access or stories may go out without the correct technical information. Plan your communications before you return media calls. Return calls or delegate them. If it is a particularly sensitive issue, you may want to consult with someone. If you are not an EPA employee, make sure that any news person you talk to knows that you are an EPA contractor. Records of communication should be made after speaking with reporters.

Help People Understand the Process Refer people to an EPA employee if they're confused about how the Superfund process works. It is a difficult thing to explain. The process will generally go smoother if people understand the flow of events. In particular, people want to know their role in the process and where and when they can participate in a meaningful way. This also helps them understand EPA's constraints.

EPA Meetings with Targeted Audiences

Date	Activity	Team Lead	Supporting Info. or Resources
Every day	Meetings with residents	Whole team	relocation package, video and removal flyer as tools to convey concern w/safety; use post-cleanup resident survey statistics to demonstrate track record.
Monthly	Update County Elected Officials and LCDEH	RPM	Dream It Do It workshop and follow up; Stimson assessment money and cleanup; CDM compilation / slides; 3-day asbestos / health conference (9/00)
Monthly	Update City elected officials and employees	RPM	
Monthly	O&M Meetings	Peggy Wendy	
Monthly	CAG Meetings	Wendy Gerald	commitment over years, attendance, facilitator, summaries
Monthly	TAG Board Meetings	EPA CDM	Denver Workshop
4/12/05	Realtors and related businesses	Paul L. Courtney	arranged info. meeting w/lenders, insurers, underwriters good real estate year - 2004
	Cleanup Workers	Shawn	88 full-time local hires in 2003 61 full time local hires in 2004 ?? full time local hires in 2005
	Business Interests	Tommy Karen	Economic development workshop, \$9M into local economy in 2003 \$8.2M into local economy in 2004
June 7,8	Outdoor Contractors and Indoor Tradesmen	Jim John P. Ron A.	Living With Vermiculite; HEPA Vacuum Fact Sheet; Contractor/Tradesmen Fact Sheets; Risk – Past, Present, and Future
	Health Care Providers	Aubrey	funded medical screening, support to get CHC and support groups funded, CARD support and funding
	Meeting with School Board and Teachers and Parent Teacher Association	EPA	EJ grant (20K) for database of students; HEPA Vacs; 2 nd hand smoke campaign; tools for schools; math and science project
	Meeting at Senior Center		
	Broad Public Meeting at Memorial Center	Jim	-Overall sampling results -Big picture progress -Big picture process -Future plans

	Technical Workshop Lite in Libby	Jim, Aubrey CDM	success of Denver workshop
	Public Meeting for formal comment on Proposed Plan	Jim	statutory requirement

Other Public Forums and Open Houses

Date	Activity	Team Lead	Supporting Info. or Resources
	EPA Information Center Open to Public	Linda Courtney	EPA wants to provide information. We are easy to contact. We welcome input and will be responsive. 100-200 inquiries/week prior to 2004
Mar. 5	ARD Health Fair	Wendy Linda	previous attendance
April 2	Annual Libby and Troy Health Fairs	Linda Karen	previous attendance
	Presentation to schools	Courtney	demos of PPE, samples of vermiculite, health professionals, residents whose homes were cleaned
March 2	Board of Realtors	Paul	
May 9	Libby Revitalization Association	Peggy	
	Rotary	Jim	

Producing and Releasing Materials and Information to the Public and Media

Date	Activity and Target Audience	Team Lead	Supporting info. Or Resources
Jan.	Fact Sheet #12 Annual Update	Wendy Karen	3 rd annual update
bi monthly	Questions & Answers about the cleanup and related issues in three local papers	Wendy	initially requested by community member, anyone can suggest questions
ASAP	Create slides which team can routinely use at meetings	CDM	Economic development slides

Feb.	Letter to Residents (75) who had cleanup but did not receive completion "letter."	Wendy Karen Terry	comfort letter
Feb.	Fact Sheet #13 Risk	Jim Wendy Karen	
Ongoing	Internet	Wendy	far-reaching
Ongoing	Providing handouts at formal and informal meetings	Team	- Public participation opportunities - information specific to audience
June	Sampling results letters for all homeowners who have not received sampling results	Peggy Wendy Jeff M	individual data
	Radio Interviews	Jim	variety of timely topics
	Paid Advertising	Wendy Karen	meetings, events, workshops document availability
	Press release	Wendy	- events, milestones
March 05	Community Survey	Wendy CDM	A few broad questions for Libby and Troy residents, 484 returned (6/2)
June	Interviews with approx. 20 community reps. for CIP	Wendy	statutory requirement.
June	Targeted Fact Sheet for Contractors and Tradesmen	Wendy	responsive to their request, what they should do if they encounter vai
Nov.	Release of Proposed Plan for Remedial Cleanup	Peggy Wendy	statutory requirement.

MESSAGES

6-17-05

What EPA wants people in Libby and Troy to feel and understand is:

We are fair
We can be trusted
We care about people's health.
Our cleanup is very protective
We are using state-of-the-art science on this cleanup
We are working hard to get a very complex cleanup done quickly
We support economic development
We are doing our best to balance things without overreacting

For them to believe these things, they have to feel satisfied not only with what EPA is doing for them, but how we are going about it - the process as well as the substance.

Process Messages

Superfund

- EPA can't do everything it wants. The Agency operates under legal authority that comes from Superfund Law.
- On October 24, 2002, the Libby Asbestos Site became a National Priorities List (NPL) site making it eligible to receive additional federal funds for a long-term remedial cleanup.
- EPA is cleaning up Libby as efficiently as is possible. To date, the cleanup has been conducted under "removal" authority but EPA is moving toward cleanup under "remedial" authority.
- Superfund allows two types of cleanup:
 - (1) Removal (*Action Memo* authorizing immediate cleanup that is time sensitive; usually 1 year and \$2 million)
 - (2) Remedial (investigative studies leading to a *Record of Decision* before cleanup; usually longer costly cleanups)
- The EPA is only authorized to do the work that is approved in the Action Memo or Record of Decision.
- The first Action Memo was issued in 2000 under emergency response or removal authority. The Record of Decision will be issued after the Proposed Plan, probably in spring 2006.
- EPA uses its current funding for residential and commercial cleanup and conducts necessary investigations such as the Contaminant Screening Study and the Risk Assessment that will lead to a Record of Decision.

- EPA is using remedial authority and funding for investigations such as Contaminant Screening Study (CSS), which provides much of the data for the RI.
- The rationale in the Action Memo authorizing removal of vermiculite from Libby attics is:
(1) trade worker exposures in attics, not exposures in homes with vermiculite, and
(2) presence of multiple exposure pathways in Libby.
- The cleanup rationale in the Record of Decision may look different but the goal is the same – protecting public health.
- EPA believes the remaining risk is significant, and that is why we are spending \$20M per year to address it. The program we have in place is designed to remove the most accessible remaining source materials and most significant exposures - as quickly and thoroughly as we can while operating under removal authority.

Community Involvement

- EPA wants people to understand what we're doing and why. We want to hear from people about their positive or negative experiences as well as constructive suggestions about how to improve our process.
- For five-and-a half years EPA has looked for ways to both share information and provide opportunities for the public to be involved in the cleanup decision-making process.
 - Information Center
 - Community Advisory Group
 - Q&As in newspapers
 - Technical Assistance Grant
 - Fact Sheets
 - Radio
 - Health Fairs
 - Public events (meetings, conferences, workshops)
- At the end of 2005 EPA hopes to propose a plan for remedial action.
- EPA is trying to educate the public about the Superfund process and their opportunities for participation.
- After ranking and comparing cleanup options to each other, EPA will formally propose a cleanup plan. There will be a public comment period on the Proposed Plan of 30 days or more. There will also be a formal meeting to describe the plan and record public comments.
- If public comment reveals new information or convincing arguments that prompt EPA change the preferred cleanup plan, EPA will issue a new Proposed Plan.

Technical Messages

Health and Safety

- The Health and Safety of our workers and the community is critical to EPA. It is our #1 concern.
- We use protective safeguards in every part of the cleanup process from sampling and analysis, to cleanup to decontamination procedures.
- On a project this big there are going to be some hiccups along the way. EPA encourages anyone to bring Health and Safety issues to our attention and we move immediately to identify, correct and prevent the problem in the future.
- EPA works closely with the Technical Assistance Group and others. We take every suggestion for improvement seriously.

Risk Assessments

- There aren't widely accepted risk models for Libby asbestos, but still a requirement to conduct and use a risk assessment.
- The nature of risk assessments in general is that they are uncertain. They don't provide any certain safe numbers.
- Because the numbers are uncertain, there is a margin of error built into the process up front to make it more protective. EPA makes in order to make the risk assessment more accurate and more protective.
- The process of risk assessment is: how often you're exposed and for how long (exposure frequency and duration) X the asbestos concentration X the toxicity of the asbestos.
- EPA standards for acceptable risk and exposure are greater than zero.

Analytical Methods

- EPA is very involved with nationally respected scientists and professionals. We are on the cutting edge in terms of research and response.
- EPA is as good at measuring asbestos in soils as is possible right now. There are benefits and drawbacks to any method. We are still using TEM for air and dust.
- PLM-VE is the best analytical method for soils that we have right now, and critical to what we are doing. It is a substantial improvement over PLM.

- Soil samples are analyzed by our most sensitive testing methods - some of them developed just for Libby. We can detect very low levels of asbestos.
- Other factors at Libby such as experienced analysts and continuity make our measurement system as good as it can be right now.
- EPA's Performance Evaluation study tests unproven and new methods for measuring asbestos in Libby soil. It is cutting edge and specially tailored for Libby soil.

Overall Cleanup

- A large team performs tasks off-site that are vital to successful work on-site (planning, database, procurement, design, risk assessment, science, records management, etc).
- The team uses safeguards to make the process very protective - some are not obvious and are very progressive. Some examples:
 - *not sampling VCI*: the majority of insulation samples taken had some level of asbestos present. Rather than sampling, EPA now assumes all VCI is contaminated and removes all VCI from accessible areas such as attics.
 - *grinding soil samples*: creates a homogeneous sample and allows for more accurate analysis
 - *counting very small fibers*: EPA includes the smallest fibers in our analysis of air and dust samples and uses the information to make our risk assessment more accurate
 - *considering Berman/Crump*: a new risk model that takes mineral type (amphibole vs. chrysotile) and fiber size into account.
 - *cleaning up everything we can detect in yard areas*: a protective approach that ensures we will not have to go back to properties we have already cleaned if a lower action level is adopted in the ROD.
 - *cleaning up all visible vermiculite in heavy use areas without sampling*: again, a more protective approach until PE study and risk assessment are completed and final action levels are established.
 - *HEPA vacuums*: with frequent use, HEPA vacs aid in minimizing exposures to interior contamination and limit the chances of recontamination at homes that have been cleaned up.
 - *Air, dust and soil samples are not averaged*: typical risk assessment practice calls for cleanup actions to be contingent on the average concentration in a home, yard, or other area. In Libby, EPA generally uses the results of individual samples – if any one sample exceeds the action level then that entire area is cleaned up, even if the average concentration in that area is less than the action level. This makes the cleanup more protective.
- EPA usually leaves vermiculite insulation in inaccessible areas such as walls or, outside, under concrete or another permanent structure because chance of exposure is relatively low.
- Clearance sampling is conducted after every cleanup to ensure that asbestos is not detected.

- EPA will continue to test the effectiveness of the cleanup by taking samples several months later in homes that have been cleaned up. To date the results of this post-cleanup sampling are very encouraging.
- Our basic approach to measuring success is two fold.
 - (1) conduct reasonably conservative clearance sampling, and
 - (2) revisit cleaned areas and measure actual exposure.

Past Assumptions in Libby and EPA's current approach related to those assumptions

- *Assumption:* Vermiculite insulation is being removed because it contaminates the dust in the interiors of homes. *Actual:* While vermiculite insulation in attics and walls *can* contaminate indoor dust if it leaks out over time or is released in large quantities, the reason for cleanup is mostly based on the risk VCI causes tradesmen and residents entering and working in attics.
- *Assumption:* Visible vermiculite in soil always indicates high levels of asbestos. *Actual:* Visible vermiculite is often a good indicator that asbestos is present, but not necessarily at high levels. Many areas with visible vermiculite, especially when the amount of vermiculite is small, have no measurable asbestos at all. We have cleaned up most areas with high levels of visible vermiculite.
- *Assumption:* There is no safe level of asbestos. Everything should be cleaned. *Actual:* In theory, there is no level of *any* cancer causing agent below which one can say there is absolutely *no* chance of disease. Asbestos is no different. However, the amount of risk is dependent on the amount of exposure and other factors – very low exposure equates to very low risk.
- *Assumption:* TEM is *always* the best method for analyzing asbestos samples. *Actual:* TEM is not the best method for analyzing soils – PLM-VE has been proven to be just as effective, if not more, and is far cheaper. TEM is expensive – at times there are cheaper methods that can do the job

Financial and Technical Constraints

- There is no scientific or legal justification or authority that allows EPA to remove all the vermiculite in Libby - our actions have to meet criteria set forth in Superfund law and be clearly justified by data.
- EPA must use the technology that is available (and approved) at the time, and acknowledges that there are uncertainties and limitations to what we know.
- Risk assessment is required by the law although there is a lack of widely accepted risk models for asbestos.

- EPA will have to legally defend its actions in the future and cannot act unilaterally, without using accepted scientific and legal standards and procedures.

Risk Management

- The cleanup is a good balance of many competing factors. While not perfect, it is very protective. EPA is always willing to improve our processes and outcomes.
- Highest known risk in Libby has been mitigated. This includes major source areas located at facilities associated with the mine (the screening and export plants) and several Libby schools. The risk presented by the remaining small scale sources is low (although still present hazards if exposures occur over a long period of time) relative to the large sources already removed.
- The disease seen today is largely from conditions and sources that are no longer present (mine operations, mine take home dust, ambient air, screening plant, export plant, ball fields, schools, carelessness with vermiculite, etc.) However, having evidence of some non-occupational health effects, EPA is committed to reducing risk.
- Asbestos, including Libby asbestos, is a fact of life across the country and in Libby. Some exposures will not be stopped by EPA, and some costs will fall to the residents. EPA is looking for ways to offset that.

Key Issues and Tradeoffs

- Far more money has been and will be spent on cleaning up major sources, such as vermiculite processing and handling areas (screening plant, export plant, railroad, mine) than has been or will be spent on individual homes. This decision is based on risk and the relative sizes of homes versus large properties.
- Each home or business EPA cleans up is different and the procedures and cost will differ slightly, but the goal and the result should be the same - a protective cleanup.

Beneficial and Harmful Impacts (Need to be communicated up front)

- Beneficial impacts *may* include:
 - attics cleaned and reinsulated
 - yards cleaned and resodded or seeded
 - gardens and flowerbeds excavated and backfilled
 - health is protected
 - peace of mind
 - property may be easier to sell
 - property may be worth more
 - yards in poor condition may be improved
 - advisement about potential location of vermiculite
 - community gets clean bill of health

- cleanup provides many local jobs
- a lot of money is coming in to Libby to local businesses
- Harmful effects may include:
 - incidental damage to home during cleanup
 - incidental damage to yard during cleanup
 - intrusion into people's personal lives
 - inconvenience of relocation
 - schedule changes
 - loss of business revenue during cleanup
 - negative media coverage
 - some local jobs may not be steady or may involve some flexibility

EPA Goals

EPA Goals in Libby include:

- conducting as thorough of an investigation as is possible
- protecting public health and the environment through cleanup of Libby asbestos
- boosting to the economy through local hiring for cleanup and related work
- providing timely and accurate information to the public
- encouraging public participation in the decision-making process
- promoting reuse of formerly contaminated industrial areas
- supporting economic redevelopment in Libby and surrounding area
- completing a comprehensive cleanup and deleting Libby from the Superfund list

EPA History / Site Background

- President Richard Nixon created EPA in 1970 to protect the environment and public health.
- Congress created Superfund in 1980 to clean up hazardous waste sites and hold polluters responsible.
- Superfund was initially funded with a trust fund created by a special tax on oil and chemical industries. The tax expired in 1996 and not been reauthorized. Superfund now depends on general appropriations (tax payer money) from Congress to do its work except in those cases where a responsible party pays for cleanup.
- EPA Region 8 began investigation and cleanup under emergency response authority in November 1999 because of reports of widespread death and illness due to asbestos exposure.
- Approximately \$110 Million has been spent on investigation and cleanup to date.

Potentially Affected Interests

- Local Residents (ongoing cleanup, cleanup done, emergency cleanup)
- asbestos victims and their families
- teachers, parents, seniors
- children
- health care providers (CARD, SJLH, CHC, Libby Care Center, ARDNet)
- ministers
- property owners (multiple property owners, landlords)
- environmental groups (forests, mines, rivers, roads)
- media (TV, Radio, Print)
- local elected officials -(state, county, local)
- federal elected officials (national)
- Lincoln County and Local Technical Services (LCDEH, Building Dept., Sheriff, Fire)
- Cleanup workers
- Activists (including CAG, TAG, AARG)
- Civic Groups (Kiwanis,
- Retail Business Interests
- Economic Development Interests (industry, recreation, tourism, hunting)
- U.S. Forest Service and their interests (logging, road construction)
- real estate agents and related businesses (developers, appraisers, inspectors)
- tradesmen (electricians, plumbers, carpenters)
- local contractors (road construction, excavators, laborers, linemen, surveyors)